

June 6, 2006

Robert V. Vantuyl Jr.
Ash Grove Cement Company
11011 Cody Street
Overland Park, Kansas 66210

Re: Comments on Montana's Draft CALPUFF Modeling Protocol for BART

Dear Mr. Vantuyl:

Thank you for your recent comments on the draft Montana CALPUFF modeling protocol. As a reminder, the CALPUFF modeling protocol is not required to be formally adopted by the Montana Board of Environmental Review. However, the Montana Department of Environmental Quality (Department) solicited public comment so that all interested parties had an opportunity to review and comment on the modeling protocol as it applies to BART.

The Department intends to use this CALPUFF guidance for all long range modeling submitted for BART, NSR, and PSD. The guidance will be posted along with the other modeling guidance on the Department's Air Resources Management Bureau web site (<http://www.deq.mt.gov/AirQuality/Visibility.asp>). The guidance will be subject to change as needed. Your participation in this process has given us a strong start.

Comment 1: Grid Spacing

The draft protocol states that 36 kilometer (km) CALMET grid spacing will be used for 2001 and 2003, and 12-km grid spacing for 2002. The proposed grids were based on the proposed MM5 data grid spacing. We have learned that the MM5 grid spacing for all three years will be 36 km.

As you noted, Ash Grove's Montana City plant is only about 32 km from the Gates of the Mountains Wilderness Area. The Department may consider using a finer CALMET grid spacing for this facility, although the MM5 spacing would remain at 36 km. The Department intends to continue the dialog with Ash Grove regarding modeling refinements specific to the Montana City cement plant.

Comment 2: PM₁₀ Speciation

We appreciate your input on the PM₁₀ speciation; the U.S. Forest Service representative had the same concern. We will look for more specific speciation information for inclusion in the modeling protocol. If you have source-specific PM₁₀ speciation data, the Department would greatly appreciate that information.

If you have any questions or additional comments on the draft modeling protocol, please feel free to contact me at (406)444-7305 or e-mail at bhabeck@mt.gov.

Sincerely,

Robert J. Habeck
AQ Policies & Planning
Science Program Supervisor
Air Resources Management Bureau

Cc: Joe Scheeler, Ash Grove Cement, 100 Hwy 518, Clancy, MT 59634